

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Eddie B Bates, Jr., Debtor

**Case No. 25-00216-KMS
CHAPTER 13**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Creditor, 21st Mortgage Corporation's, as successor to United Community Bank (as successor to Reliant/ Reliant Bank/ Reliant Bank MH) Motion for Relief from Stay and for Other Relief (dk # 42) as follows:

1. Debtor commenced this case on 01/28/2025 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor filed a Motion to Allow Payment Arrearage (Dk#51) due to his employer not deducting the plan payments.
3. The employer is now deducting the payments.
4. Debtor can continue making the plan payments.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

Of Counsel:

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on July 15, 2025, to:

By USPS First Class Mail:

21st Mortgage Corporation
P.O. Box 477
Knoxville, TN 37901

By Electronic CM/ECF Notice:

David Rawlings

Edward E. Lawler, Attorney for Creditor

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

1
2
3
4 **UNITED STATES BANKRUPTCY COURT**
5 **SOUTHERN DISTRICT OF MISSISSIPPI**

6 IN RE:
7 Eddie B Bates, Jr.

8 CASE NO: 25-00216
9
10 **DECLARATION OF MAILING**
11 **CERTIFICATE OF SERVICE**
12 Chapter: 13

13 On 7/15/2025, I did cause a copy of the following documents, described below,

14
15
16
17
18 Response

19
20
21
22
23
24
25
26
27
28 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/15/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

1
2
3 **UNITED STATES BANKRUPTCY COURT**
4 **SOUTHERN DISTRICT OF MISSISSIPPI**

5 IN RE:
6 Eddie B Bates, Jr.

7 CASE NO: 25-00216
8 **CERTIFICATE OF SERVICE**
9 **DECLARATION OF MAILING**

10 Chapter: 13

11 On 7/15/2025, a copy of the following documents, described below,

12 Response

13
14
15
16
17
18
19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
herein.

21 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
22 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
Service and that it is true and correct to the best of my knowledge, information, and belief.

23 DATED: 7/15/2025

24 
25

26 Miles Wood
27 BK Attorney Services, LLC
28 d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

21ST MORTGAGE CORPORATION

P.O. BOX 477

KNOXVILLE TN 37901